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September 11, 2023

VIA E-FILING AND HAND DELIVERY

The Honorable Christopher J. Burke
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801

Re: *British Telecommunications PLC, et al. v. Palo Alto Networks, Inc.*
D. Del. C.A. No. 22-1538-CJB

Dear Judge Burke:

Pursuant to paragraphs 3 and 7(g) of the Scheduling Order (D.I. 62), the parties in the above-referenced matter write to request the scheduling of a teleconference to resolve a protective order dispute.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (by telephone) on September 8, 2023:

Delaware Counsel: Jonathan A. Choa (#5319), Michael Farnan

Lead Counsel: Nolan A. Goldberg, Edward Wang, Anish Desai, Greg Stephenson, Tom Yu

The dispute requiring judicial attention is listed below:

1. The parties disagree how source code will be made available for inspection.
 - BT proposes the source code be made available for inspection either remotely or in-person near Austin, Texas (the location of its currently-contemplated source code reviewer).
 - PAN does not agree to remote inspection of source code or production in Austin, Texas. PAN agrees to make its own source code available for in-person inspection at its outside counsel's offices in Silicon Valley, New York City, or Washington, DC.

Respectfully,

/s/ Philip A. Rovner

Philip A. Rovner

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cc: Counsel of Record (via E-File)